



U.S. Department of Justice
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 13, 2020

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Angelo Alvarado, et al.*,
20 Cr. 91 (LGS) – Joint Request for Adjournment of Status Conference

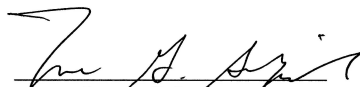
Dear Judge Schofield:

The Government writes on behalf of the parties in the above-referenced matter to respectfully request that the presently-scheduled status conference at 11:00 a.m. on April 23, 2020 be adjourned for a period of approximately sixty days. In accordance with the prior scheduling order, (Dkt. No. 31), initial discovery has been produced and the defendants, Angelo Alvarado, Darryl Henderson, and Jonathan Rios, have submitted deferred prosecution and/or Young Adult Opportunity Program (“YAOP”) applications. Due to the COVID-19 outbreak, however, pretrial service interviews with respect to the deferred prosecution applications are delayed and the YAOP application remains pending.

The parties jointly request that time between April 23, 2020 and the next court date be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial because it will allow the defense time to prepare and allow the parties to continue to engage in discussions regarding a potential pretrial disposition of this matter.

Application Granted. The status conference currently scheduled for April 23, 2020 is adjourned to July 9, 2020 at 11:10 a.m. For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and July 9, 2020 outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h)(7)(A). It is hereby ORDERED that the time between today and July 9, 2020 is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 34.

Dated: April 13, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: _____/s/
Danielle M. Kudla
Assistant United States Attorney
(212) 637-2304

cc: Jean Barrett, Esq. (via email)

Richard Palma, Esq. (via email)
Jennifer Willis, Esq. (via email)